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*Attorneys for Plaintiffs***IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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| ATLAS DATA PRIVACY CORPORATION, et al. | CIVIL ACTION NO. 24-3993 (Hon. Harvey Bartle, III) |
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| ATLAS DATA PRIVACY CORPORATION, et al. v. ATDATA, LLC, et al. | CIVIL ACTION NO. 24-4447 |

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| ATLAS DATA PRIVACY CORPORATION, et al. v. SEARCHBUG, INC., et al. | CIVIL ACTION NO. 24-5658 |
| ATLAS DATA PRIVACY CORPORATION, et al. v. AMERILIST, INC., et al. | CIVIL ACTION NO. 24-5775 |
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**CERTIFICATION OF COUNSEL IN SUPPORT OF PLAINTIFFS’
MOTION TO SEAL UNDER LOCAL CIVIL RULE 5.3(C)**

I, RAJIV D. PARIKH, of full age, hereby certify as follows:

I am an attorney duly admitted to practice before this Court and a partner at PEM Law LLP, attorneys for plaintiffs Atlas Data Privacy Corporation (“Atlas”), as assignee of individuals who are Covered Persons, and the named individual plaintiffs (collectively, the “Plaintiffs”) against defendants in the above-referenced actions. As such, I am fully familiar with the facts of these consolidated actions and respectfully submit this Certification in support of Plaintiff’s Motion to Seal certain materials pursuant to Local Civil Rule 5.3(c).

1. On June 15, 2024, the Defendants filed a Consolidated Motion to Dismiss under Federal Rule of Civil Procedure 12(b)(6) (ECF No. 27), seeking dismissal of Plaintiffs’ claims on several grounds, including constitutional challenges to Daniel’s Law. In response, on August 5, 2024, Plaintiffs filed their Response to Defendants’ Consolidated Motion to Dismiss, contesting the Defendants’ arguments and defending the constitutionality of Daniel’s Law. (ECF No. 49)

2. The Defendants’ motion to dismiss is currently pending before this Court. Given the sensitive nature of the information involved and the ongoing risks

to Covered Persons, Plaintiffs have moved to seal certain materials submitted in connection with the Defendants' motion to dismiss. The materials at issue include the Declaration of Serrin Turner (ECF No. 27-1) and various exhibits (ECF Nos. 27-3 to 27-10, and 27-34), which contain sensitive information that could potentially endanger Covered Persons if disclosed publicly.

3. The specific justification for the permanent sealing of each exhibit is detailed in **Exhibit A** of this Motion to Seal.

4. A true and correct copy of the Transcript, April 18, 2024, is attached hereto as **Exhibit B**).

5. Prior to the filing of this Motion, I have communicated with counsel for the Defendants, who have stated that they take no position on the relief sought.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s Rajiv D. Parikh
RAJIV D. PARIKH

Date: September 27, 2024